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10 Attorneys for Defendants PPC Claims Limited
11 And Kieran Paul Cassidy

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

REACHLOCAL, INC.,

Plaintiff,

vs.

PPC CLAIMS LIMITED AND
KIERAN PAUL CASSIDY,

Defendants

Case No. 2:16-cv-1007-R-AJW

Judge: Hon. Manuel L. Real

**PPC CLAIMS LIMITED AND
KIERAN PAUL CASSIDY'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL**

[Filed concurrently: PPC Claims Limited and Kieran Paul Cassidy's Application for Leave to File Under Seal; Declaration of Erik Syverson; Redacted Exhibits A & B and Certain Portions of the Motion for Summary Judgement Are Proposed to be Filed Under Seal; Unredacted Materials Proposed to be Filed Under Seal; and [Proposed] Order]]

1 Pursuant to Local Rule 79-5, Defendants' PPC Claims Limited and Kieran
2 Paul Cassidy ("Defendants") hereby apply for leave of Court to file Exhibits A & B
3 to the Declaration of Erik Syverson in Support of Application for Leave To File
4 Under Seal. Exhibit A are excerpts from the deposition of Sharon Rowlands and
5 Exhibit B are excerpts from Plaintiff's initial disclosures. Portions of both exhibit
6 were marked confidential by Plaintiff.

7 Defendants also apply for leave of Court to file the declaration of Kris
8 Barton under seal. This was marked confidential by Plaintiff.

9 Defendants also apply for leave of Court to redact certain portions of the
10 Motion that refer to information Plaintiff's appear to deem confidential.

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12 Dated: September 2, 2016

RAINES FELDMAN LLP

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14 By: /s/ Erik S. Syverson
15 ERIK S. SYVERSON
16 Attorneys for Defendants PPC Claims
17 Limited and Kieran Paul Cassidy

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